

FW: UAO**Robert Fox** <RFox@mankogold.com>

Wed 5/5/2021 8:37 AM

To: Carr, Brian <Carr.Brian@epa.gov> 1 attachments (7 KB)

Clarifications to UAO Provisions.pdf;

Brian:

During our conference, there were a few provisions in paragraph 73 of the Order where EPA and the City agreed on the intent of the provisions, but the language of the Order needed revision to clarify that intent. You suggested that the City provide to you suggested clarifying language. Attached is the City's suggested clarifying language.

I wanted to be clear that these suggested revisions are limited to those areas of clarification where there was an acknowledgement during the conference of the intended meaning of those provisions. As the City expressed during the conference, there are several other provisions for which the City has raised legal and/or technical concerns. By submitting these clarifications, the City is not waiving any of those legal and technical concerns with the Order. Rather, the City desires that EPA continue to evaluate these concerns in the context of issuing a final Order. The City remains willing to participate in a workshop to discuss these concerns more fully before the Order becomes effective.

Thank you for your consideration.

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